

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELLIOT MCGUCKEN,

Plaintiff,

v.

SHUTTERSTOCK, INC., et al.,

Defendants.

Civil Action No.: 1:22-cv-00905-GHW

**PLAINTIFF’S NOTICE OF MOTION TO EXCLUDE EXPERT TESTIMONY OF
STEVE HECK**

TO THE HONORABLE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Plaintiff, Dr. Elliot McGucken, by his undersigned attorneys, upon the accompanying Memorandum of Law, and the Declaration of Scott Alan Burroughs, respectfully moves this Court before the Honorable Gregory H. Woods, U.S.D.J., at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 12C, New York, New York 10007, to exclude the testimony of Steve Heck. Any opposition is due in accord with Judge Woods' orders and Individual Rules.

PLEASE TAKE FURTHER NOTICE that Plaintiff respectfully requests oral argument if this motion is opposed.

Respectfully submitted,

Dated: January 20, 2023

By: /s/ Scott Alan Burroughs
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